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Material	Basis for Sealing	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Any Prior Orders Sealing the Materials at Issue	Party in Opposition to Sealing, if any, and Basis
Portions of RCS' Agency Operations Manual attached as Exhibit 6 to the Declaration of Kimberly Hannigan submitted in support of Defendants' Motion for Summary Judgment	Confidential and proprietary business information related to Defendants' internal practices and procedures. <i>See</i> Certification of Monica M. Littman at ¶¶7-8.	Defendants' competitors and unknown potential third-party litigants would be able to use Defendants' own internal proprietary and confidential information related to business practices and procedures to their own advantage and to the detriment of Defendants. <i>See</i> Certification of Monica M. Littman at ¶9.	No less restrictive alternative available as no members of the public can have access to Defendants' confidential, proprietary and internal documents reflecting Defendants' business practices and procedures. <i>See</i> Certification of Monica M. Littman at ¶10.	March 25, 2021 Order sealed unredacted version of December 4, 2020 Order discussing portions of RCS' Agency Operations Manual. <i>See</i> ECF No. 98; Certification of Monica M. Littman at ¶11.	Plaintiff has not provided a response to Defendants regarding Plaintiff's position regarding Defendants' request to seal. <i>See</i> Certification of Monica M. Littman at ¶12.

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RCS' Policies & Procedures relative to credit reporting attached as Exhibit 5 to the Declaration of Kimberly Hannigan submitted in support of Defendants' Motion for Summary Judgment	Confidential and proprietary business information related to Defendants' internal practices and procedures. <i>See</i> Certification of Monica M. Littman at ¶¶7-8.	Defendants' competitors and unknown potential third-party litigants would be able to use Defendants' own internal proprietary and confidential information related to business practices and procedures to their own advantage and to the detriment of Defendants. <i>See</i> Certification of Monica M. Littman at ¶9.	No less restrictive alternative available as no members of the public can have access to Defendants' confidential, proprietary and internal documents reflecting Defendants' business practices and procedures. <i>See</i> Certification of Monica M. Littman at ¶10.	None. <i>See</i> Certification of Monica M. Littman at ¶11.	Plaintiff has not provided a response to Defendants regarding Plaintiff's position regarding Defendants' request to seal. <i>See</i> Certification of Monica M. Littman at ¶12.